

OFFICIAL FILE

ORIGINAL

ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

MONROE COUNTY ELECTRIC)
CO-OPERATIVE, INC. and ILLINOIS POWER)
COMPANY d/b/a AMEREN IP)
)
Joint petition for approval of request to serve)
pursuant to Section 7 of the Service Area)
Agreement dated September 7, 1979,)
between Monroe County Electric Co-Operative,)
Inc. and Illinois Power Company, d/b/a)
Ameren IP)

Docket No.

06-0414

STIPULATED MOTION FOR A PAPER HEARING

NOW COME the parties, Illinois Power Company d/b/a AmerenIP ("AmerenIP"), by Brown, Hay & Stephens, LLP, Scott C. Helmholtz and Richard S. Wolters, and Monroe County Electric Co-Operative, Inc. ("Monroe") by J U L I A N O, a professional corporation and its attorney, Rand Juliano, hereby seek leave to conduct the above-captioned proceedings as a Paper Hearing pursuant to 83 Ill.Admin.Code §200.525. In support of this request, the parties state as follows:

1. The parties have filed a Joint Petition under Section 7 of the previously approved Service Area Agreement between the parties.
2. Attached to the Petition is a true and correct copy of a Customer Request to Serve (marked for identification purposes as "Joint Petition Exhibit A") and a true and correct copy of an Electric Supplier Request to Serve made pursuant to Section 7 of the Service Area Agreement (marked for identification purposes as "Joint Petition Exhibit B").
3. The Rules of Practice of the Illinois Commerce Commission permit the parties and Staff participating in a proceeding to stipulate to the waiver of a hearing and to the resolution of the matter based solely on the written pleadings and affidavits in a process described as a Paper Hearing (83 Ill.Admin.Code §200.525(a)). Such a stipulation may be filed

at any time prior to the date the Administrative Law Judge marks the case Heard and Taken (83 Ill.Admin.Code §200.525(d)). The stipulation is subject to the approval of all parties, Staff and the Administrative Law Judge (83 Ill.Admin.Code §200.525(b)).

4. The parties agree that a Paper Hearing would be an efficient means of resolving the Joint Petition, as it appears there are no areas of controversy.

5. Attached hereto and marked for identification purposes as Joint Stipulation Exhibit A ("Stipulation"), is the Stipulation to be signed by the Staff member in the event one is assigned to this docket prior to the preparation of an order for the Illinois Commerce Commission's consideration. In the event no Staff member is assigned, both signatories to this Stipulation expressly waive the necessity of having Staff review this petition and/or file a Staff Stipulation.

6. An affidavit supporting the Stipulation and Exhibits is attached hereto and marked for identification as Joint Stipulation Exhibit B.

7. AmerenIP prepared and circulated a Draft Order, attached to this Joint Stipulation as Joint Stipulation Exhibit C.

WHEREFORE, the parties request that this proceeding be conducted as a Paper Hearing and that an Order substantially similar to the Draft Order attached to the Joint Petition as Joint Stipulation Exhibit C be entered.

Illinois Power Company
d/b/a AmerenIP

Monroe County Electric Co-Operative, Inc.,
an Illinois not-for-profit corporation

By: 

Richard S. Wolters
Brown, Hay & Stephens, LLP
205 South Fifth Street, Suite 700
P.O. Box 2459
Springfield, IL 62705
Telephone: (217) 544-8491
Facsimile: (217) 241-3111

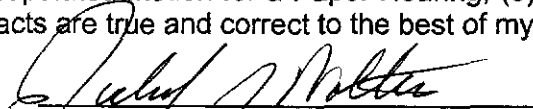
By: 

Rand Juliano
JULIANO, a professional corporation
772 Wall Street, Suite A
O'Fallon, IL 62269
Telephone: (618) 632-0200
Facsimile: (618) 632-0222


State of Illinois)
) SS.
County of Sangamon)

Verification

I, **Richard S. Wolters**, certify that (1) I am an attorney for Illinois Power Company d/b/a AmerenIP; (2) I have read the attached Stipulated Motion for a Paper Hearing; (3) I am familiar with the facts stated herein; and, (4) the facts are true and correct to the best of my knowledge.


Richard S. Wolters

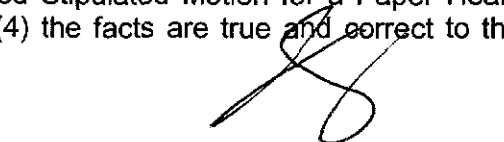
Subscribed and sworn to before me this 19th day of May, 2006.


Notary Public
OFFICIAL SEAL
CINDY STOCKER
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 5-11-2009

State of Illinois)
) SS.
County of St. Clair)

Verification

I, **Rand Juliano**, certify that (1) I am the Attorney for Monroe County Electric Co-Operative, Inc.; (2) I have read the attached Stipulated Motion for a Paper Hearing; (3) I am familiar with the facts stated herein; and, (4) the facts are true and correct to the best of my knowledge.


Rand Juliano

Subscribed and sworn to before me this 17th day of May, 2006.


Notary Public

OFFICIAL SEAL
SUSAN R. PEARCE
Notary Public, State of Illinois
My Commission Expires 05-18-08